

IN THE CIRCUIT UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EVA SARKEES,)	
)	Case No. 07 C 6370
Plaintiff,)	
)	Judge Lefkow
-vs-)	
)	Magistrate Judge Denlow
KBR, INC. f/k/a KELLOGG BROWN & ROOT)	
SERVICES, INC.; and)	
HALLIBURTON COMPANY,)	
)	
Defendants.)	

MOTION FOR LEAVE TO AMEND COMPLAINT

The plaintiff, Eva Sarkees, by her attorney, David L. Goldberg, moves this honorable court for leave to file her Amended Complaint. In support, the plaintiff states as follows:

1. Plaintiff filed her Complaint at Law in state court on October 5, 2007 (Cook County, Illinois Docket No. 2007 L 10579), naming KBR, Inc. f/k/a Kellogg Brown & Root Services, Inc. and Halliburton Company as defendants.
2. On November 9, 2007, the defendant, Halliburton Company filed its notice of removal.
3. On November 17, 2007, Halliburton filed its Motion to Dismiss, pursuant to F.R.C.P. 12(b)(2), arguing that the court lacked personal jurisdiction over Halliburton. Halliburton's Motion was granted.
4. In addition to Halliburton's dismissal from the case, Plaintiff has learned that she incorrectly named KBR, Inc. f/k/a Kellogg Brown & Root Services, Inc. as a

defendant, when, in fact, the correct name of said defendant is Kellogg Brown & Root Services, Inc.

5. Plaintiff seeks to file her Amended Complaint, instant for the purposes of removing Haliburton Company as a defendant and properly reflecting Kellogg Brown & Root Services, Inc. as the sole defendant in this case. *(A copy of the plaintiff's proposed Amended Complaint is attached herein as Exhibit "1" and is incorporated by reference.)*

WHEREFORE, the plaintiff, Eva Sarkees, by her attorney, David L. Goldberg, respectfully requests an order granting her leave to file her Amended Complaint, instant.

Respectfully submitted,

By: _____
Attorney for the Plaintiff

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